
ARNOLD & PORTER LLP

Kent A. Yalowitz

Kent.Yalowitz@aporter.com
+1 212.715.1113
+1 212.715.1399 Fax
399 Park Avenue
New York, NY 10022-4690

August 28, 2014

VIA ECF

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I write regarding Plaintiffs' Objections and Cross-Designations to Defendants' Counter-designations of deposition testimony for use at trial. DE 589.

This filing is not called for under the Federal Rules of Civil Procedure, this Court's Local Civil Rules, or Your Honor's Individual Practices. Typically, counter-designations may be addressed without the need for a formal objection process. However, the vast majority of defendant's counter-designations are not "necessary to explain the admitted portion, to place the admitted portion in context, to avoid misleading the jury, or to ensure fair and impartial understanding of the admitted portion." *United States v. Jackson*, 180 F.3d 55, 72 (2d Cir. 1999).

Therefore, plaintiffs have compiled their objections to defendants' counter-designations for the Court's review and consideration in advance of the September 16, 2014 conference; the enclosed document also provides cross-designations requested by the plaintiffs in the event defendants' counter-designations are allowed.

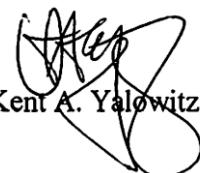
In addition, as the Court is aware, the parties have submitted a proposed Joint Pretrial Order for the Court's consideration, and plaintiffs' application to correct and supplement Exhibit 3-1 to the Proposed JPTO also remains before the Court. DE 441, 520. Plaintiffs respectfully request further to supplement Exhibit 3-1 by adding a

ARNOLD & PORTER LLP

Hon. George B. Daniels
August 28, 2014
Page 2

document, as Plaintiffs' Exhibit 1118, which was not published until after the proposed JPTO was submitted. The document is a June 25, 2014 press release by the Israeli Government Press Office. Plaintiffs provided a copy of this document to defendants on June 30, 2014.

Respectfully,



Kent A. Yalowitz

cc: Brian A. Hill (via electronic mail)